

MICHAEL A. CARDOZO
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Attorney for Defendant The City of New York
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Hearing date: November 29, 2011
Hearing time: 3:00 p.m.
Objections due: November 22, 2011

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
OTR MEDIA GROUP INC.,	:	Case No. 1-11-47385 (ESS)
	:	
Debtor.	:	
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OTR MEDIA GROUP, INC., <i>et al.</i> ,	:	Adv. Pro. No. 1-11-01448
	:	
Plaintiffs,	:	
	:	
vs.	:	NOTICE OF MOTION FOR
	:	ORDER DECLARING THAT
THE CITY OF NEW YORK,	:	CITY MAY ENFORCE ITS
	:	SIGN REGULATIONS
	:	<u>AGAINST DEBTOR</u>
Defendant.	:	
-----	X	

PLEASE TAKE NOTICE that upon the Declaration of Brian T. Horan and Memorandum of Law dated November 10, 2011, the City of New York, by and through its counsel Michael A. Cardozo, Corporation Counsel of the City of New York (the "City"), will move before the Honorable Elizabeth S. Stong, United States Bankruptcy Judge, at the United States Bankruptcy Court, Eastern District of New York, located at 271 Cadman Plaza East, Brooklyn, New York, on November 29, 2011 at 3:00 p.m. or as soon thereafter as counsel can be heard, for an order (i) declaring that the automatic stay does not apply to either (a) the issuance by the City's Department of Buildings of notices of violation ("NOVs") citing violations by the Debtor, or its affiliates or indemnitees (if any), of the City's Administrative Code, Zoning

Resolution, or another law or rule regulating outdoor advertising in the City or (b) the adjudication of those NOV's by the City's Environmental Control Board; and (ii) in the alternative, granting the City relief from the automatic stay with respect to the issuance and adjudication of NOV's against the Debtor.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, as modified by any administrative orders entered in this case, and be filed with the bankruptcy Court electronically in accordance with General Order #462, by registered users of the bankruptcy Court's case filing system, and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, Microsoft Word, DOS text (ASII), or a scanned image of the filing, with a hard copy delivered directly to Chambers, and be served in accordance with General Order #462, and served on the New York City Law Department, 100 Church Street, New York, New York 10007, attention: Brian T. Horan, Esq., and so as to be received no later than November 22, 2011. Such papers shall conform to the Federal Rules of Civil Procedure and identify the party on whose behalf the papers are submitted, the nature of the response, and the basis for such response.

Dated: New York, New York
November 10, 2011

MICHAEL A. CARDOZO
Corporation Counsel of the City of New York
Attorney for Defendant The City of New York

By: /s/ Brian T. Horan
Brian T. Horan
Assistant Corporation Counsel
New York City Law Department
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CERTIFICATE OF SERVICE

Brian T. Horan, Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for Defendant the City of New York, certifies as follows:

I am over 18 years of age and am not a party to this action. On November 10, I served (i) the City's Notice of Motion for an Order Declaring that the City May Enforce Its Sign Regulations Against Debtor, (ii) the Declaration of Brian T. Horan, together with exhibits, (iii) a Memorandum of Law, and (iv) a proposed order, by email as follows:

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Dated: November 10, 2011
New York, New York

/s/ Brian T. Horan
Brian T. Horan